

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

**GIBRALTAR GLOBAL SECURITIES, INC.,
and WARREN A. DAVIS,**

Defendants.

13 CV 2575 (GBD) (JCF)

**NOTICE OF MOTION OF SECURITIES AND EXCHANGE
COMMISSION FOR A SANCTION OF DEFAULT JUDGMENT AND RELATED
REMEDIES AGAINST DEFENDANTS GIBRALTAR GLOBAL SECURITIES, INC.
AND WARREN DAVIS**

Plaintiff Securities and Exchange Commission (“SEC”) hereby respectfully moves for the imposition of a default judgment as a sanction pursuant to Federal Rules of Civil Procedure Rule 37(b)(2)(A)(vi) and Rule 37(d)(3) against defendants Gibraltar Global Securities, Inc. and Warren Davis (“Defendants”). Based on the default judgment, it is requested that the Court provide the SEC with the appropriate remedies, including the ordering of injunctions, payment of disgorgement and civil monetary penalties.

The motion is based on the Defendants’ refusal to comply with the discovery orders of the Court. The Defendants have announced that they are refusing to participate further in the proceedings of the Court.

Defendants also have announced that they do not oppose the Plaintiff’s motion and the entry of a default judgment.

For the reasons stated herein and in the accompanying submissions, it is requested that the SEC's motion be granted.

Dated: June 12, 2015

Respectfully submitted,

By: /s/Kevin P. O'Rourke
KEVIN P. O'ROURKE
Attorney for Plaintiff
SECURITIES AND EXCHANGE COMMISSION
100 F Street, N.E.
Washington, D.C. 20549-1040
Telephone: (202) 551-4442
Facsimile: (202) 772-9245
ORourkeK@sec.gov

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2015, copies of:

- 1) NOTICE OF MOTION OF SECURITIES AND EXCHANGE COMMISSION FOR A SANCTION OF DEFAULT JUDGMENT AND RELATED REMEDIES AGAINST DEFENDANTS GIBRALTAR GLOBAL SECURITIES, INC. AND WARREN DAVIS;
- 2) MEMORANDUM IN SUPPORT OF SECURITIES AND EXCHANGE COMMISSION MOTION FOR A SANCTION OF DEFAULT JUDGMENT AND RELATED REMEDIES AGAINST DEFENDANTS GIBRALTAR GLOBAL SECURITIES, INC. AND WARREN DAVIS;
- 3) DECLARATION OF GARY L. PETERS IN SUPPORT OF THE SECURITIES AND EXCHANGE COMMISSION'S MOTION FOR A SANCTION OF DEFAULT JUDGMENT AGAINST DEFENDANTS GIBRALTAR GLOBAL SECURITIES, INC. AND WARREN DAVIS; and
- 4) Proposed FINAL JUDGMENT OF DEFAULT AGAINST GIBRALTAR GLOBAL SECURITIES, INC. AND WARREN DAVIS AND ENTERING JUDGMENT OF PERMANENT INJUNCTIONS, ORDERS TO PAY DISGORGEMENT AND CIVIL MONETARY PENALTIES

were served pursuant to FRCP 5.1(b)(1) on the following counsel of record for Defendants via the Court's ECF filing system.

Nicholas M. De Feis, Esq.
Philip Patterson, Esq.
DE FEIS O'CONNELL & ROSE, P.C.
New York New York 10110
(212) 768-1000
Attorney for the Defendants

/s/Kevin P. O'Rourke